

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

United States District Court  
Southern District of Texas  
FILED

for the

Southern District of Texas

MAR 21 2017

United States of America )

v. )

DANIEL BETANCOURT )

USC 408:1997 )

David J. Bradley, Clerk  
Case No. M-17-0494-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 21, 2017 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

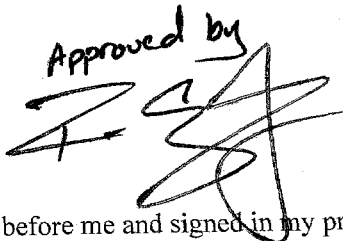
18 U.S.C Section 1001 (a) 2

## Offense Description

Whoever within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully makes any materially false, fictitious, or fraudulent statement or representation.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.Approved by  


Complainant's signature

Nicholas C. Regini Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 3/21/2017City and state: McAllen, Texas 8:56am

Judge's signature

Peter E Ormsby  
U.S. Magistrate Judge  
Printed name and title

Affidavit

1. FBI Special Agents have learned that LUIS ENRIQUE PEREZ-TALAVERA, LUIS GERARDO BETANCOURT, and JONATHAN CARLOS VALDEZ conspired during November 2015 to take certain Mexican Nationals hostage. The purpose of the hostage taking was to demand a ransom payment from the family members of the hostages in exchange for their release. According to LUIS ENRIQUE PEREZ-TALAVERA and JONATHAN CARLOS VALDEZ, DANIEL BETANCOURT, who is LUIS GERARDO BETANCOURT's brother, was also present during some of the conspiratorial conversations regarding the hostage taking preparations in November 2015.
2. On or about November 30, 2015, LUIS ENRIQUE PEREZ-TALAVERA, LUIS GERARDO BETANCOURT, and JONATHAN CARLOS VALDEZ traveled to Mexico to effectuate the hostage taking of four Mexican nationals. Upon their arrival to Reynosa, Tamaulipas, Mexico the four Mexican nationals were taken hostage and held for ransom until their family members paid approximately \$18,000. After the payment was made, the hostage takers continued to demand more money. On December 4, 2015, the family members reported this matter to the local law enforcement. FBI began their investigation and arrested LUIS GERARDO BETANCOURT in conjunction to the hostage taking. On December 8, 2015, the four Mexican nationals were released and proceeded to the Port of Entry in Hidalgo, Texas. At the Port of Entry, the Mexican nationals were interviewed and identified LUIS ENRIQUE PEREZ-TALVERA and JONATHAN CARLOS VALDEZ as being the hostage takers.
3. On March 21, 2017, DANIEL BETANCOURT was interviewed by the FBI regarding the aforementioned hostage taking for ransom at the Hidalgo, Texas Port of Entry. DANIEL BETANCOURT made multiple materially false statements and representations to include his lack of any knowledge and involvement in regards to the planning of the hostage taking and the relationship and the roles of LUIS ENRIQUE PEREZ-TALAVERA, LUIS GERARDO BETANCOURT, and JONATHAN CARLOS VALDEZ. DANIEL BETANCOURT also denied being present at any planning for the hostage taking. DANIEL BETANCOURT was informed that it was a federal offense to make any false statement to a federal agent.
4. FBI's investigation of the hostage taking of the four Mexican nationals was a matter within the jurisdiction of the executive branch of the Government of the United States.